# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CONTINENTAL AUTOMOTIVE SYSTEMS, INC.,

Plaintiff,

CASE NO. 3:19-CV-02933-M

v.

AVANCI, LLC, et al.

Defendants.

## DEFENDANTS' AMENDED MOTION TO DISMISS FIRST AMENDED COMPLAINT

Pursuant to the Court's January 27, 2020 Order (Dkt. 264), Defendants Avanci, LLC; Avanci Platform International Limited; Nokia Corporation; Nokia of America Corporation; Nokia Solutions and Networks US LLC; Nokia Solutions and Networks Oy; Nokia Technologies Oy; Conversant Wireless Licensing SARL; Optis UP Holdings, LLC; Optis Cellular Technology, LLC; Optis Wireless Technology, LLC; and Sharp Corporation (collectively, "Defendants") hereby submit a revised version of their Motion to Dismiss and Memorandum in Support ("Motion").

Attached at Exhibit A is a clean version of Defendants' revised Motion. Exhibit B is a redline version of the same, reflecting the additions to Defendants' original Northern District of California motion, for purposes of reviewing the amount Defendants' added. This version does not reflect the deletions Defendants made from the original motion. Finally, to further assist the Court in determining the amount Defendants added, Exhibit C reflects only material added (rendering it nonsensical to read, but reflecting precisely the length of the added material).

For the reasons set forth in the attached, Defendants request that the Plaintiff's First Amended Complaint be dismissed in its entirety.

Dated: February 10, 2020 Respectfully submitted,

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# **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and foregoing document has been served on February 10, 2020 to all counsel of record via the Court's CM/ECF system.

/s/ Michael J. Newton
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